

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
STATESVILLE DIVISION
CIVIL ACTION NO. 5:24-cv-00028-KDB-SCR**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

NOVANT HEALTH, INC.

And

COMMUNITY HEALTH SYSTEMS, INC.,

Defendants.

**DEFENDANTS' MOTION FOR AMENDED PROTECTIVE ORDER, AS TO WHICH
PLAINTIFF FEDERAL TRADE COMMISSION HAS NO OPPOSITION**

Defendants Novant Health, Inc. (“Novant”) and Community Health Systems, Inc. (“CHS”) respectfully move for an amended, non-interim protective order pursuant to Fed. R. Civ. P. 26(c), in the form attached as Exhibit 1 (the “Amended Order”), to achieve necessary access for certain in-house counsel to prepare for the defense of this litigation and to preserve the purported confidentiality of materials disclosed by Plaintiff Federal Trade Commission (“FTC”) and others in this action. Novant and CHS have conferred with the FTC regarding this motion in accordance with Local Rule 7.1(b), and the FTC does not oppose this motion. The parties are, however, jointly requesting that the court defer entering the Amended Order for three days from the filing of this motion to ensure that third-party objectors, if any, have a further opportunity to be heard.

Defendants thus respectfully request that pursuant to Fed. R. Civ. P. 26(c), the Court enter the proposed protective order attached as Exhibit 1 on March 1, 2024. In support of this motion, Defendants submit an accompanying memorandum of law.

Dated: February 27, 2024

Respectfully Submitted,

/s/ Heidi K. Hubbard

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